

HANSON BRIDGETT LLP  
KURT A. FRANKLIN, SBN 172715  
kfranklin@hansonbridgett.com  
LISA M. POOLEY, SBN 168737  
lpooley@hansonbridgett.com  
SAMANTHA WOLFF, SBN 240280  
swolff@hansonbridgett.com  
425 Market Street, 26th Floor  
San Francisco, California 94105  
Telephone: (415) 777-3200  
Facsimile: (415) 541-9366

HANSON BRIDGETT LLP  
TYSON M. SHOWER, SBN 190375  
tshower@hansonbridgett.com  
LONDON D. BAILEY, SBN 240236  
lbailey@hansonbridgett.com  
500 Capitol Mall, Suite 1500  
Sacramento, California 95814  
Telephone: (916) 442-3333  
Facsimile: (916) 442-2348

OTTEN LAW, PC  
VICTOR OTTEN, SBN 165800  
vic@ottenlawpc.com  
KAVITA TEKCHANDANI, SBN 234873  
kavita@ottenlawpc.com  
3620 Pacific Coast Highway, #100  
Torrance, California 90505  
Telephone: (310) 378-8533  
Facsimile: (310) 347-4225

Attorneys for Plaintiffs  
CORY SPENCER, DIANA MILENA  
REED, and COASTAL PROTECTION  
RANGERS, INC.

**UNITED STATES DISTRICT COURT**  
**CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**

CORY SPENCER, an individual;  
DIANA MILENA REED, an  
individual; and COASTAL  
PROTECTION RANGERS, INC., a  
California non-profit public benefit  
corporation,

Plaintiffs,

CASE NO. 2:16-cv-02129-SJO (RAOx)  
**DECLARATION OF SAMANTHA  
WOLFF REGARDING PLAINTIFFS'  
MOTION FOR MONETARY  
SANCTIONS**

Judge: Hon. Magistrate Judge Rosella  
Oliver

1  
2 v.

Complaint Filed: March 29, 2016  
Trial Date: November 7, 2017

3 LUNADA BAY BOYS; THE  
4 INDIVIDUAL MEMBERS OF THE  
5 LUNADA BAY BOYS, including but  
6 not limited to SANG LEE, BRANT  
7 BLAKEMAN, ALAN JOHNSTON  
8 AKA JALIAN JOHNSTON,  
9 MICHAEL RAE PAPAYANS,  
10 ANGELO FERRARA, FRANK  
11 FERRARA, CHARLIE FERRARA,  
and N. F.; CITY OF PALOS VERDES  
ESTATES; CHIEF OF POLICE JEFF  
KEPLEY, in his representative  
capacity; and DOES 1-10,

12 Defendants.  
13

14 I, Samantha Wolff, declare as follow:

15 1. I am attorney duly admitted to practice before this Court. I am a  
16 partner with Hanson Bridgett LLP, attorneys of record for Plaintiffs Cory Spencer,  
17 Diana Milena Reed, and the Coastal Protection Rangers, Inc. ("Plaintiffs") in this  
18 action. I have personal knowledge of the matters set forth in this declaration and, if  
19 called as a witness, I could and would competently testify to the matters stated  
20 herein.

21 2. On August 23, 2017, this Court granted Plaintiffs' Motion for  
22 Monetary Sanctions against Charlie Ferrara, Frank Ferrara and their Counsel of  
23 Record Bremer Whyte Brown & O'Meara ("Monetary Sanctions Motion," Dkt. 403)  
24 as to Defendants' failure to comply with this Court's July 13, 2017 Order. (Dkt.  
25 432.) The Court also directed Plaintiffs' counsel to submit a further declaration to  
26 detail the expenses caused by this failure. (*Id.*)

27 3. On August 23, 2017, the Court also declined to rule on Plaintiffs'  
28 Sanction Motion to the extent it was based on alleged spoliation of evidence because

1 the issue was intertwined with issues raised in multiple motions pending before the  
2 District Judge in this case. (Dkt. 432.)

3 4. After this Court's August 23, 2017 ruling, the parties agreed to resolve  
4 Plaintiffs' Monetary Sanctions Motion (Dkt. 403) through Defendants' payment of  
5 the amount sought by Plaintiffs in their motion.

6 5. Thus, Plaintiffs now consider their Monetary Sanctions Motion (Dkt.  
7 403) resolved and no longer seek the Court's assistance in determining the amount  
8 to be awarded for Defendants' failure to comply with this Court's July 13, 2017  
9 Order. Additionally, Plaintiffs will not seek any further monetary sanctions from  
10 the Court for the alleged spoliation of evidence raised in Plaintiffs' Monetary  
11 Sanctions Motion.

12 6. Plaintiffs will continue to pursue their pending Motion for Sanctions  
13 Against Defendants Charlie Ferrara, Frank Ferrara and Sang Lee, which seeks  
14 evidentiary sanctions and an adverse inference. (*See* Dkt. 425.)

15 I declare under penalty of perjury under the laws of the United States of  
16 America that the foregoing is true and correct. Executed in Walnut Creek,  
17 California on September 5, 2017.

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20 /s/ Samantha Wolff  
21 SAMANTHA WOLFF  
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